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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: 88-FL-02. Section 18 Crisis Exemption. Benomyl on  
Cabbage. No MRID #. RCB # 3198.

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TO: S. Austin/D. Stubbs, PM Team #41  
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The State of Florida has declared a crisis exemption under FIFRA Section 18 for the use of Benlate WP (EPA Reg # 352-354) on cabbage. The active ingredient in Benlate WP is benomyl [methyl 1-(butylcarbamoyl)-2-benzimidazole carbamate].

A tolerance is established for the residues of benomyl and its metabolites containing the benzimidazole moiety in or on cabbage at 0.2 ppm (seed treatment or seed crops) [40CFR180.294].

A preharvest foliar use on cabbage at 0.5 to 1.0 lb ai/A ten days before harvest was proposed in PP1E2469. RCB recommended the tolerance be established at 5 ppm on the basis of cabbage and lettuce residue data (K. Arne's review of 4/19/85).

This Section 18 exemption proposes benomyl be applied on young cabbage leaves before "cupping" at a rate of 0.75 lb ai/A as a foliar spray by ground equipment. A second application would be allowed 14 days later. No preharvest interval has been specified.

Residue data discussed in connection with PP1E2469 (RCB review of 3/5/82) indicated that following one application at 2 or 4 lbs ai/A, residues on untrimmed mature cabbage ranged from 0.02 to 1.10 ppm (PHI of 70 or 79 days) and 0.03 to 0.22 ppm (PHI of 110 days).

Since the proposed use is an early season use, RCB estimates the combined residues of benomyl are not likely to exceed 2 ppm.

Cabbage is not used for animal feed. There will be no transfer of secondary residues to meat and milk.

#### CONCLUSIONS

1. The residue of concern consists of benomyl and its metabolite containing the benzimidazole moiety.
2. Analytical methodology is available for enforcement (Method I in PAM II).
3. Combined residues of benomyl are not likely to exceed 2 ppm as a result of this Section 18 proposed use.
4. There will be no transfer of secondary residues of benomyl to meat and milk as a result of this emergency use.
5. The standard is available from the Pesticides and Industrial Chemicals Repository at RTP, NC.

#### RECOMMENDATIONS

RCB has no objections to this Section 18 exemption, TOX considerations permitting. An agreement should be made with FDA regarding the legal status of treated cabbage in commerce.

cc:Circ, RF, Benomyl 18 F, Cheng, PMSD/ISB  
RDI:EZager:1/21/88:RDSchmitt:1/22/88  
TS-769:RCB:CM#2:Rm810:Cheng:1/21/88:1:1/22/88